

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§ Case No. 16-34028
	§
NORTHSTAR OFFSHORE GROUP, LLC	§
	§
	§ Chapter 11
Debtor.	§
JAMES KATCHADURIAN, Litigation Trustee, on behalf of Northstar Litigation Trust,	§
	§
	§ ADVERSARY NO. 18-03079
Plaintiff,	§
v.	§
NGP ENERGY CAPITAL MANAGEMENT, LLC; NGP X US HOLDINGS, L.P.; NGP NATURAL RESOURCES X, L.P.; NGP X PARALLEL HOLDINGS, L.P.; NGP NATURAL RESOURCES X PARALLEL FUND, L.P.; NOG ROYALTY HOLDINGS, LP; CHRISTOPHER RAY; JESSE BOMER; TOMAS ACKERMAN; DAVID ALBIN; DAVID HAYES; S. GLYNN ROBERTS; GAYLON FREEMAN; MARK STEVENS; and JAMES P. ULM, II,	§
	§
Defendants.	§

**UNOPPOSED MOTION TO EXTEND DEADLINE TO
FILE REPLY IN SUPPORT OF MOTION TO DISMISS (Dkt. 23)**

Defendants Northstar Directors S. Glynn Roberts, Gaylon Freeman, Mark Stevens and James P. Ul, II, (collectively, the “Movants”) hereby file this *Unopposed Motion to Extend Deadline to File Reply in Support of Motion to Dismiss* (the “Unopposed Motion”) and respectfully request that this Court enter an order extending the time in which the Movants may file a reply (the “Reply”) in support of their Motion to Dismiss [Adv. Dkt. No. 23] (the

“Motion to Dismiss”) the Plaintiff’s Original Complaint [Adv. Dkt. No. 1] (the “Complaint”) through and including August 3, 2018.¹ Prior to filing this Unopposed Motion, counsel for the Movants conferred with counsel for Plaintiff James Katchadurian (the “Plaintiff” or the “Trustee”), the Trustee of the Northstar Litigation Trust, regarding this Unopposed Motion, and the Plaintiff has consented to the extension requested herein. In further support of this Unopposed Motion, the Movants respectfully submit:

I.
RELEVANT BACKGROUND

1. On April 19, 2018, the Plaintiff filed the Complaint, commencing this adversary proceeding.
2. On June 4, 2018, Defendants NGP Energy Capital Management, LLC, NGP X US Holdings, LP, NGP X Natural Resources X, L.P.; NGP X Parallel Holdings, L.P.; NGP Natural Resources X Parallel Fund, L.P.; NOG Royalty Holdings, LP; Christopher Ray, Jesse Bomer, Tomas Ackerman, David Albin and David Hayes filed their Motion to Dismiss [Adv. Dkt. No. 19]. Movants joined in this motion, making separate arguments where appropriate. [Adv. Dkt. No. 23].
3. At the June 22, 2018 Rule 16 conference, this Court set July 27, 2018 as the deadline for the Movants to file the Reply (the “Reply Deadline”).
4. On July 13, 2018, the Plaintiff filed its Response to the Motion to Dismiss [Adv. Dkt. No. 39].

¹ The filing of this Unopposed Motion is not an admission by the Movants as to the adequacy of the Plaintiff’s pleadings or the appropriateness of the Bankruptcy Court’s exercise of jurisdiction and/or constitutional authority over the claims asserted in the Complaint, or a waiver of any defects in service. The Movants expressly reserve all rights in this regard and otherwise.

5. Subsequently, the Movants requested that the Plaintiff agree to provide the Movants with an extension of the Response Deadline to August 3, 2018, and the Plaintiff agreed to such extension.

6. The hearing regarding the Motion to Dismiss is set for August 27, 2018 at 2:00 p.m.

**II.
RELIEF REQUESTED AND BASIS FOR RELIEF**

7. By this Unopposed Motion, the Movants request that this Court enter an order, substantially in the form of the proposed order attached hereto, approving the extension of their Reply Deadline through and including August 3, 2018.

8. This Court has broad powers pursuant to 11 U.S.C. §105 to grant the requested extension. Further, Bankruptcy Rule 9006(b) authorizes this Court to extend the Movants' Reply Deadline, with or without motion, if the request for such extension is made before the expiration of such deadline.

9. As the parties are at the initial stage of litigation, the granting of the Unopposed Motion for extension will not burden the parties, nor will it require the Court to modify any other deadlines.

10. The Plaintiff has agreed that the extension of the Movants' Reply Deadline requested herein shall be effective between the Plaintiff and the Movants pending entry of an Order of this Court approving the extension requested herein.

WHEREFORE, the Movants respectfully request that this Court enter an order, substantially similar to the proposed order attached hereto: (i) extending the Movants' Reply

Deadline through and including August 3, 2018; and (ii) granting such other and further relief as the Court deems just and proper.

Dated: July 20, 2018.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Gregory S. Hudson

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**ATTORNEYS FOR DEFENDANTS
S. GLYNN ROBERTS; GAYLON
FREEMAN; MARK STEVENS; AND
JAMES P. ULM, II**

CERTIFICATE OF CONFERENCE

I hereby certify that, on July 19, 2018, the Movants' counsel conferred with Plaintiff's counsel regarding the relief sought in this motion, and Plaintiff's counsel indicated that the Plaintiff is not opposed to the relief sought in this motion.

/s/ Gregory S. Hudson

Gregory S. Hudson

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on those parties entitled to notice via this Court's ECF system on July 20, 2018.

/s/ Gregory S. Hudson

Gregory S. Hudson